

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEVERLY BEAM**NO: 1:CV-01-0083****Plaintiff****vs.****(Judge McClure)****FILED**
HARRISBURG, PA

JAN 30 2003

SCOTT DOWNEY, ROGER**MORRISON, DAVID****GRAYBILL AND MICHAEL****SWEGER,**MARY E. D'ANDREA, CLERK
Per 7/8**JURY TRIAL DEMANDED****Defendants**

**PLAINTIFF'S OBJECTION TO SCOTT DOWNEY'S
TAXATION OF COSTS**

1.) On or about January 20, 2003, the defendants Scott Downey submitted a taxation of costs in the amount of \$2,426.84 for alleged costs relating to the defense of Mr. Downey in the action above.

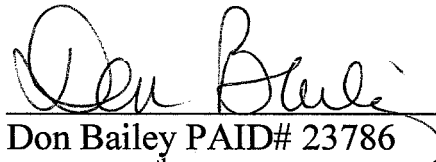
2.) The taxation requests indicate that the deposition costs were singly borne by the defendants, yet the figures submitted in related attorney's fees petitions appear to indicate shared costs.

3.) Plaintiff is concerned she is paying twice for a deposition cost that the defendants Downey, Morrison, and Graybill and Sweger, according to documents with their attorney's fees petition, seem to have spilt 3 ways.

4.) Plaintiffs object that as a matter of law this matter has not ended and is in fact before this Court in a new lawsuit (02-1797) as a result of the Honorable James F. McClure dismissing the previous action without prejudice and before the statute of limitations had expired.

WHEREFORE plaintiff objects to the taxation of costs by Mr. Scott Downey.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Don Bailey", is written over a horizontal line.

Don Bailey PAID# 23786
4311 N. 6th Street
Harrisburg, PA 17110
(717) 221-9500

CERTIFICATE OF SERVICE

I, Don Bailey do hereby certify that on this **30TH day of January**
2003 I served a true and correct copy of **PLAINTIFF'S OBJECTION TO**
TAXATION OF COSTS to the attorney below by First class-postage
prepaid mail:

STEVEN J. SCHIFFMAN ESQUIRE
2980 LINGLESTOWN ROAD
HARRISBURG, PA 17110

STOCK & LEADER
STEPHEN RUSSELL ESQUIRE
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RESPECTFULLY SUBMITTED,

BAILEY STRETTON & OSTROWSKI



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